

**PIERCE BAINBRIDGE**

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**VIA ECF**

November 8, 2019

The Honorable I. Leo Glasser  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Greene, et al. v. Kabbalah Centre International, Incorporated, et al.*,  
19-cv-4304 (ILG) (SJB)

Dear Judge Glasser:

We represent Plaintiffs in the above-referenced matter. Pursuant to Your Honor's Individual Rules, the parties propose the following briefing schedule for the filing of a motion in lieu of an answer to the Amended Complaint:

Deadline for Defendants to file a motion in lieu of an answer: **November 25, 2019**

Deadline for Plaintiffs to file an opposition to a motion  
in lieu of an answer: **December 23, 2019**

Deadline for Defendants to file a reply to Plaintiffs' opposition: **January 20, 2020**

Defendants consent to this proposed briefing schedule. Enclosed is a Stipulation agreed to by all parties, filed concurrently with this request.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Theodore J. Folkman  
Theodore J. Folkman

Enclosure

cc: Counsel for All Defendants (via ECF)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JAMES GREENE, JENNIFER SHAAL, OFER  
SHAAL, JAKE STONE, GUY SHOSHAN, EINAT  
EZRA MICHAELI, and YIFAT SHMILOVICH, on  
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

KABBALAH CENTRE INTERNATIONAL,  
INCORPORATED; KABBALAH CENTRES OF  
THE UNITED STATES, INCORPORATED;  
KABBALAH CENTRE OF NEW YORK,  
INCORPORATED; THE KABBALAH CENTRE OF  
FLORIDA, INC.; KABBALAH CHILDREN'S  
ACADEMY; KABBALAH ENTERPRISES,  
INCORPORATED; KAF INVESTMENTS, LLC; 501  
N. LA CIENEGA, LLC; SPIRITUALITY FOR KIDS  
INTERNATIONAL, INC.; and KAREN BERG,  
YEHUDA BERG, and MICHAEL BERG,

Defendants.

No. 19-cv-4304 (ILG)(SJB)

**STIPULATION AND ORDER SETTING**  
**BRIEFING SCHEDULE ON**  
**MOTION IN LIEU OF AN ANSWER**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned  
attorneys for the parties, that:

1. The deadline for Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; Spirituality For Kids International, Inc.; and Karen Berg, Yehuda Berg, and Michael Berg (collectively, "Defendants") to move, answer, or otherwise respond to the Amended Complaint is no later than November 25, 2019;

2. If any Defendant files a motion in lieu of an answer, the deadline for Plaintiffs James Greene, Jennifer Shaal, Ofer Shaal, Jake Stone, Guy Shoshan, Einat Ezra Michaeli, and Yifat Shmilovich (collectively, “Plaintiffs”) to file an opposition is no later than December 23, 2019; and
3. The deadline for Defendants to file a reply to Plaintiffs’ opposition is no later than January 20, 2020.

Facsimile or electronic signatures on this Stipulation are hereby deemed originals. No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants hereby expressly reserve, any and all defenses.

Dated: New York, New York  
November 8, 2019

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*Attorneys for Plaintiffs and the Proposed  
Collective and Class*

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States, Incorporated; Kabbalah  
Centre of New York, Incorporated;  
The Kabbalah Centre of Florida, Inc.;  
Kabbalah Children's Academy;  
Kabbalah Enterprises, Incorporated;  
KAF Investments, LLC; 501 N. La  
Cienega, LLC; and Spirituality for  
Kids International, Inc.*

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*Attorneys for Defendant Yehuda  
Berg*

Dated: Brooklyn, New York  
\_\_\_\_\_, 2019

**SO ORDERED:**

\_\_\_\_\_  
HON. I. LEO GLASSER

UNITED STATES SENIOR DISTRICT JUDGE